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Attorneys for Charging Party INTERNATIONAL ASSOCIATION
OF MACHINISTS AND AEROSPACE WORKERS, LOCAL
LODGE 2949, AFL-CIO

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 28

PAE AVIATION AND TECHNICAL
SERVICES, LLC,

Respondent,

and

INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS, LOCAL LODGE 2949, AFL-CIO,

Charging Party.

Cases 28-CA-170401
28-CA-175936

**RESPONSE TO NOTICE TO SHOW
CAUSE**

The Charging Party concurs that the remaining matters should be referred to an Administrative Law Judge for further proceedings. By copy of this to the Region, the Charging Party is asking to be provided five subpoena duces tecum and five subpoenas ad testificandum. This information will be necessary to establish the lack of business justification, the discriminatory enforcement and the overbreadth of the rules at issue. We look forward to a prompt hearing.

Dated: October 26, 2018

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ David A. Rosenfeld
DAVID A. ROSENFELD

Attorneys for Charging Party INTERNATIONAL
ASSOCIATION OF MACHINISTS AND
AEROSPACE WORKERS, LOCAL LODGE
2949, AFL-CIO

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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction this service was made. I am over the age of eighteen years and not a party to the within action.

On October 26, 2018, I served the following documents in the manner described below:

RESPONSE TO NOTICE TO SHOW CAUSE

- ☒ (BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from kkempler@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

E-Filing

Office of the Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001

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Attorneys for National Labor Relations Board

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 26, 2018, at Alameda, California.

/s/ Karen Kempler
Karen Kempler